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June 2, 2022

VIA ECF

Hon. Ramon E. Reyes, Jr.
United States Magistrate Judge
Eastern District of New York
225 Cadman Plaza East
Courtroom 6F North
Brooklyn, NY 11201-1804

Re: Klimovitsky v. JG Innovative Industries, Inc., *et al.*
Case No.: 1:21-cv-755 (MKB) (RER)

Dear Judge Reyes:

This firm represents the Plaintiff in the above-referenced action. I write jointly with the consent of counsel for Defendant to respectfully request an extension of time until June 27, 2022 for the parties to submit their Settlement Agreement covering Plaintiff's wage and hour claims asserted pursuant to the Fair Labor Standards Act and New York Labor Law to the Court for approval pursuant to Cheeks v. Freeport Pancake House, Inc., 796 F.3d 199 (2d Cir. 2015).

The parties reached a settlement of the Plaintiff's claims at the mediation session held on March 15, 2022. Defense counsel drafted the proposed Settlement Agreement which was provided to Plaintiff on April 8, 2022. Since then, there have been revisions proposed by both parties. Plaintiff is currently in Israel and the time difference has made it challenging to communicate with her regarding the proposed revisions to the Settlement Agreement and thus the undersigned requires this additional time to review the Settlement Agreement draft with Plaintiff. All parties consent to this request.

Plaintiff thanks this honorable Court for its time and attention to this case.

Dated: Forest Hills, New York
June 1, 2022

Respectfully submitted,

SHALOM LAW, PLLC

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